DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
6 COMMERCE DRIVE, CRANFORD, NEW JERSEY 07016-1101 (201) 272-8300

September 9, 1987

Chief, Site Investigation and Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Attention: SCP - Carlstadt Project Officer

Dear Sir:

Attached is the August, 1987 Progress Report for RI/FS project at the SCP Carlstadt site. This report has been prepared by Dames & Moore, on behalf of the Committee representing the Respondents named in the Administrative Order on Consent No. II CERCLA-50114, in accordance with Paragraph 28B of the Order.

Very truly yours,

DAMES & MOORE

Gerard M. Coscia

Gerard M. Coscia, P.E.
Project Manager

GMC/jhm
Attachment

cc: Chief, Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
Room 437
26 Federal Plaza
New York, New York 10278

T. Armstrong
General Electric

J. Koczan
Dames & Moore

003509

ATTACHMENT 1

SCP RI/FS PROGRESS REPORT - AUGUST 1987

PROGRESS AND STATUS

1. The total number of samples collected during Phase I and Phase II is as follows:

   - o Soil — 41 +_2 duplicates = 43
   - o Ground and Surface Water — 14 + 1 duplicate = 15
   - o Sediment — 8 + 1 duplicate = 9
   - o Total Samples (all matrices) = 67

2. Reviewed analytical results for the following eight soil samples for which laboratory reports were received during August:

   - o Monitor Well 1S: 0-1 foot and 1-2 feet
   - o Monitor Well 2D: 0-1 foot, 1-2 feet, and top of clay
   - o Monitor Well 4S: 0-1 foot and 1-2 feet
   - o Monitor Well 6S: 1-2 feet

3. Received preliminary analytical results for approximately 50 percent of the remaining Phase I and Phase II samples (28 of 59 samples).

4. Began site evaluation with respect to geology and hydrogeology.

5. The technical issue of well purging discussed in the July 1987 Progress Report (Item 3) was addressed in Revision 3 to the Project Operations Plan (POP) and transmitted to the EPA on August 10. Revision 3 also contained a revised parameter table (Appendix A, Table A-2). The transmittal requested written EPA approval of the revisions, and this has not been received as of August 31. EPA had previously given verbal approval to these revisions.

6. EPA written approval of Revision 2 to the POP had not been received as of August 31.

7. No comments on the geohphysical data had been received from EPA by August 31.

TECHNICAL ISSUES

The initial review of the laboratory data indicates that there are problems with some of the parameters with respect to holding times and method detection limits. A more comprehensive evaluation is now in progress. Several possible scenarios for dealing with the laboratory data are presented below.

The standard RI approach is to incude all laboratory data, along with a discussion of any excursions, in the draft RI Report for EPA review. After EPA review, limited resampling and re-analysis may be required. This approach is acceptable if there is sufficient usable data for assessing site conditions, but it will significantly lengthen the overall project schedule if re-sampling is required.

The EPA has indicated in recent discussions that they would be willing to review the SCP laboratory data as an interim RI submittal prior to submittal of the draft RI Report. The EPA expects that the review could be completed within one month. While this may delay submittal of the draft RI Report, it would facilitate EPA's review of the draft since their data review will have been completed in advance. Thus, the overall project schedule, including the EPA draft RI Report review period, may not be significantly lengthened, unless re-sampling is required.

The EPA has indicated that we may be able to use the analytical results from their split samples in lieu of re-sampling at corresponding locations. Should this be the case, we may be able to combine EPA's data with our data to perform a site evaluation and prepare the draft RI Report. In this case, the schedule impact would be minimized.

If a substantial portion of the data is deficient (based on our evaluation), a fourth alternative would be to re-sample where necessary prior to submitting data to EPA for review. Again, this would have a major schedule impact.

SCHEDULE

The data evaluation will be completed during September. The Phase III field (second round of water samples) work will be delayed until the evaluation is concluded. As of August 31, the project was an additional two weeks behind schedule, for a total RI schedule slippage of four weeks (based on the June 1 start date for the Phase I field work). Further schedule delays will occur if re-sampling is required.

PLANNED ACTIVITIES — SEPTEMBER, 1987

1. Continue site evaluation with respect to geology and hydrogeology.

2. Complete laboratory data evaluation.